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June 11, 1996

The Hon. Reed E. Hundt, Chairman
Federal Communications Commission
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of Federal-State Joint Board on Universal Service
CC Docket No. 96-45

What follows are the official views, unanimously authorized by the Board of Directors of the Shawnee Free-Net (SFN) regarding the FCC's universal service goals as set out in the Telecommunications Act of 1996. Before preceding, we refer you to the comments already made before the FCC on this docket by Jeffrey Blumenfeld and Glenn B. Manishin, attorneys for the National Public Telecomputing Network (NPTN).

We essentially concur with the position taken by NPTN regarding *the inadvisability of direct subsidization of particular access providers or platforms* as a means to ensure universal access. NPTN argues that *the federal government should alternatively provide direct support to Free-Nets* and those seeking to start them. We agree. Acknowledging our vested interest in these two compatible positions, we offer evidence in their support derived from professional experience at community computer network development.

For the last three years, Southern Illinoisan volunteers in Carbondale, a rural community of roughly 27,000 people, have been trying to launch a regional "community computing system" to serve most of economically poor, Southern Illinois. It has been far from easy. The citizens began in the spirit of cooperation by seeking partnerships with assorted units of local government so as to:

- Maximize public investments in communications infrastructure;
- Minimize duplication of effort;
- Achieve economies of scale;
- Diversify funding sources for financial stability; and
- Guarantee equal and equitable access for more citizens.

We have also tried to be as inclusive as possible in our mode of organizing to ensure that no *single organization* (IE. Library, city government, school district, newspaper, etc.) Or *geographically dominant organization* (county or regional government, etc.) inappropriately dominated policy development or retarded true community-based planning and resource development. We have attempted to leverage the taxing capacity and diverse technology available to these larger units of government and piggyback a community computing system substantially, but not completely, on their existing communications infrastructures. We did so

in order to provide several alternative methods of acquiring on-line resources by the poor and geographically isolated.

Six quick examples:

1. We sought to make terminal-based access to Free-Net facilitated resources (including the internet/WWW) available via the regional library system's existing data network of non-graphical, UNIX terminals that library patrons already use for library catalog searching.
2. We sought to use the excess bandwidth of newly installed, high bandwidth, dedicated phone lines connecting area community colleges for video classroom use.
3. We sought to construct for an area school district (which we did substantially complete) a wireless, two megabit/sec data network that connected classrooms to the internet through our regional network hub.
4. We sought in two separate instances to work through the local, state supported university to a) acquire an internet data feed and to b) partner with the local Public Broadcasting Service TV station to jointly run the community system and accelerate delivery of internet services to area schools.
5. We sought to partner with the Cooperative Extension Service to bring internet access nodes to isolated regional field offices where public access, dial-up terminals would be freely made available to the public, thus helping to help spur rural computer literacy and local economic development.

Note that each of these six efforts relied on six different technology platforms to accomplish the same goal, that of increasing citizen access to internet, the World Wide Web, and locally hosted, community information resources. We tried cooperating with five different units of government, explored six different modes of funding the activities, and five different models of how users could access data types (library resources, school information, internet data warehouses, etc.).

All six approaches failed!

We have concluded that the complex reasons for the failure (so far) have been that each of the five other principal partners was either:

1. Wedded to an obsolescing technology infrastructure (usually government dictated technology platforms);
2. Committed to a mission statement that was too inflexible to meet diverse community communications needs; or
3. Was ensnared in state government policy that inflexibly dictated how their unit of government should be hierarchically organized and connected electronically with proprietary communications service providers.

The first example project failed to materialize because the administrator of the regional library system feared that young adults using the library terminals could not be prevented from using the internet for "entertainment purposes". He also did not want to provide even the most basic of e-mail services to the poor. "Entertainment", in this case, is not a code word for pornography. Rather, the library administrator simply felt library computers shouldn't be especially fun to use lest it become too popular and cause noise in the classically quite halls of learning.

In the second example, we sought to utilize the wasted bandwidth of a new downstate "video classroom" project. Under the system operated by the state colleges, dedicated T1 channels were to go underutilized for most of the day, night and summer months while classes were not in session. Despite millions of dollars of taxpayer investment in these politically popular, high-tech, video classrooms, the participating educational institutions didn't want to be bothered with providing other community communications services (e-mail, WWW browsing, etc.) to anyone, let alone persons that were not immediately affiliated with their institutions (i.e. enrolled students).

In the third example, once we designed and installed the primary components of the school's wireless intranet system, the school district immediately severed its ties with us while under pressure from the regional school superintendent's office to change to it as the school's internet service provider and thus help their office subsidize and justify its expensive internet feed. In taking away our internet service provider status with the school to justify the State Board of Education's development of a statewide non-inclusive, community disconnected intranet, our community organization lost an opportunity to a) fairly compete for connecting area schools to the internet and 2) forge a better link between schools and their communities. Essentially, the State decided to go into competition with our non-profit organization that preceded the State in bringing internet connectivity services to schools. This State system now effectively harms the cause of universal access in the equitable manner offered by our community Free-Net.

In the first instance of the fourth example with the state university, unlike the experience of several Free-Nets elsewhere, the local university did not want to provide us with a data feed. In the second instance, the university affiliated PBS TV station perceived our organization as a "communications services competitor" and would not bargain in good faith in a joint grant solicitation we brought to the negotiation table unless they had 100% control over all expenditures and content development.

Lastly, in our fifth example at bringing more equitable information access to the region, we failed to succeed in collaboration because the Cooperative Extension officials we dealt with wanted to:

- a) control and take credit for the entire system and help justify the existence of the financially threatened rural extension advisor offices in remote agricultural communities, and
- b) establish their own statewide, proprietary computer network which duplicated others already in existence.

These six fruitless, and economically draining attempts at collaboration substantially contributed to a three year delay in getting our community Free-Net fully operational. Time spent trying to educate technologically uninformed bureaucrats and placate government institutions with their own narrow, institutional agendas significantly diverted us from concentrating on the larger goal of providing universal and affordable access for all Southern Illinois citizens.

For the FCC, now, to endorse the "direct subsidization of particular access providers or platforms," be they higher education institutions, library systems, the Cooperative Extension Service, or other comparable levels of government, is absolutely antithetical to the bitter knowledge we gained from these six unsuccessful attempts.

We suggest that there is likely no single model of how the FCC can guarantee equal access by the public if the model is based on existing government units operating the system. We can't imagine success coming from directly subsidizing 1) libraries, 2) the Cooperative Extension Service, 3) local school districts, 4) community colleges, or 5) State Boards of Education. Each of these entities has too narrow of an agenda that is often at odds with providing **universal access**. At least in our State, they have not shown to us that they appreciate the diversity in need by the public for equitable telecommunications services nor do they understand the value of universal access.

Our experience in Illinois says that direct subsidization of these government entities will result in:

- Wasteful public investments in communications infrastructure that may be *obsolescent* before it is fully instituted.
- Wasteful *duplication* of infrastructure construction that drains local economies.
- Possible economies of scale, but at the cost of *less flexibility and delays in adaptation* to emerging technology.
- Financial instability for independent community networks that must compete on a *non-level playing field* with government subsidized platforms, and
- *Unequal and inequitable access for all citizens* because of the vagaries of elected officials in control of platforms and internet service operations.

As NPTN indicated in its testimony, government support for community-based Free-Nets would essentially avoid the kind of major problems that the Shawnee Free-Net experienced. Support for Free-Nets would be "technology and content-neutral and would encourage the communications industries to offer competitive services for community computing."

We agree. We wish there were more competition! Southern Illinois is so rural and isolated that even the ubiquitous America Online computer service no longer has a toll-free phone number anywhere in the rural region. Nor can we purchase ISDN services from our local telephone exchange carrier. The service is not offered. Our Shawnee Free-Net organization hopes to change the competitive marketplace by providing low-cost computer access in rural communities.

Politically neutral and economically independent, community Free-Nets would, if partially subsidized with federal dollars, also have the capability to freely shop the open market for technology platform choices and internet services and thus bring to citizens the best that technology and business have to offer the nation. " Once a level playing field is established in this high-flux industry we say "let the market decide. Without financial stability and minimal government support for independent community Free-Nets, universal access may not be attainable now or anytime in the foreseeable future, especially for rural areas.

Despite our past failures at collaboration referenced above -- or perhaps because of its lessons learned from them -- we are proceeding this summer, due to the support of hundreds of local supporters of the Shawnee Free-Net, with a major expansion of our truly citizen-supported, community computing system. It will be difficult serving rural, Southern Illinois. However, we remain committed to support for universal access and are trying, despite governmental opposition and indifference to build in Southern Illinois a system that makes it possible. We may not succeed without FCC support.

We will be developing a content neutral network and will seek divergent voices on our network that reflects our regional character. We are also going to be technology neutral. We will be operating a hybrid system of Apple Macintoshes and PC clones interconnected with assorted ethernet networks and PC operating systems using wireless, satellite and dedicated internet hardware connections. Within the coming year, when Asymmetric Digital Subscriber Line (ADSL) service becomes more widely available at low cost, we expect that we will transition quickly to it so as to remain cost-effective and accessible to more rural patrons of our system.

Will other quasi-government service providers be able to set our pace for adaptation? Will the government bureaucrats of rural, local governments understand the implications of these fast emerging technologies and support equitable, universal access? Regretfully, we think not.

In conclusion, we argue to the Commission that it is inappropriate to directly subsidize particular government or commercial access providers or platforms as a means to ensure universal access. We conclude after painful experience in the real world that the best route the FCC could take is to provide direct support to community supported, independent Free-Nets and those seeking to start them.

If you put your faith in community organizations that have a solid vision for implementing universal access, we am sure you will not be disappointed by the creativity with which local citizen coalitions come together and build a robust and resilient system of interconnected community information systems.

Sincerely,

On behalf of the Board of Directors of
Shawnee Free-Net, Inc.



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